

United States District Court
For The Northern District of New York

DEFENDANTS' EXHIBIT LIST

Case No.: 1:13-CV-1018
Date: May 13, 2016
Presiding Judge: Hon. Mae A. D'Agostino

() Plaintiff (**X**) Defendant () Court

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
D-1.					Personnel file of James Karam
D-2.					Undated receipt signed by James Karam listing personal items received from Undersheriff Russo.
D-3.					September 13, 2013 correspondence from Jack Mahar to Lt. James Karam
D-4.					Rensselaer County Paystub with earnings summary for Check No. 374598
D-5.					5 page email chain between May 8, 2012, 7:20 a.m. and May 14, 2012 at 10:22 a.m. between Ruth Vibert and Jim Karam
D-6.					Unexecuted August 29, 2012 time and attendance review to Lt. James Karam from Cpt. H. Smith
D-7.					Rensselaer County Sheriff's Office oral warning record signed by Ruth Vibert dated August 29, 2012 directed to J. Karam
D-8.					October 31, 2012 Incident report, reporting Officer James Karam
D-9.					Employee injury/illness due process review application dated October 31, 2012

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
D-10.					November 29, 2012 E-mail from “Lisa Karam” to Harold Smith.
D-11.					Rensselaer County Paystub with earnings summary for Check No. 00374536, dated March 1, 2013
D-12.					Worker’s Compensation Board C-3 Form executed by James Karam
D-13.					Rensselaer County Paystub with earning summary for Advice No. 000451592 dated March 15, 2013
D-14.					Rensselaer County’s Equal Employment Opportunity Policy
D-15.					Rensselaer County Office of the Sheriff Administrative Manual, §8 – Employee Conduct
D-16.					Rensselaer County Office of the Sheriff Administrative Manual, §11 – Sick Leave Procedures
D-17.					Medical records of Karner Psychological Associates
D-18.					Medical records of Capital Care Medical Group, LLC.
D-19.					Medical records of Richard E. Ovens, Psy.D.
D-20.					May 1, 2013 report of Russell Denea, MD, DFAPA regarding IME of James Karam
D-21.					Affidavit of James Karam dated June 3, 2015
D-22.					June 25, 2013 Transcript of Hearing before Workers’ Compensation Board
D-23.					Compilation of individuals submitting 207-c applications with dates of approval or denial.
D-24.					Summary of sick bank donation usage between 2005 and 2012

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
D-25.					Correction Bureau Organization Chart dated August 19, 2005
D-26.					Audio Recording - Id #802-0002, with Sheriff Mahar, Keith Jackson, Shane Holcomb, Lisa Girardi, Brian Goldberger, Sherry from Dr. Ovens office, Marcelle Swanberry, Tony, Hal Smith
D-27.					Audio Recording - Id #802-0006, with James Karam and Undersheriff Russo
D-28.					Audio Recording - Id #802-0007, with James Karam and Ashley Bombard
D-29.					Audio Recording - Id #802-0008, with James Karam and Linda Baldwin
D-30.					Audio Recording - Id #802-0009, with James Karam and Undersheriff Russo
D-31.					Audio Recording - Id #802-0010, with James Karam
D-32.					Audio Recording - Id #802-0011, with James Karam
D-33.					Audio Recording - Id #802-0012, with James Karam, Tom Hendry, and possibly Tom Hendry's assistant
D-34.					Audio Recording - Id #802-0013, with James Karam
D-35.					Audio Recording - Id #802-0014, with James Karam and Captain Hal Smith
D-36.					Audio Recording - Id #802-0015, with James Karam and Undersheriff Russo

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
D-37.					Audio Recording - Id #802-0016, with James Karam and Stephen Pechenik
D-38.					Audio Recording - Id #802-0017, with James Karam and Captain Hal Smith
D-39.					Audio Recording - Id #802-0018, with James Karam and Linda Baldwin
D-40.					Audio Recording - Id #802-0019, with James Karam and Captain Hal Smith
D-41.					Audio Recording - Id #802-0021, with James Karam
D-42.					Audio Recording - Id #802-0022, with James Karam and Stephen Pechenik
D-43.					Audio Recording - Id #802-0023, with James Karam and Rich Crist
D-44.					Audio Recording - Id #802-0024, with James Karam and Tom Hendry
D-45.					Audio Recording - Id #802-0026, with James Karam and Undersheriff Russo
D-46.					Audio Recording - Id #802-0027, with James Karam
D-47.					Audio Recording - Id #802-0028, with James Karam and unknown person
D-48.					Audio Recording - Id #802-0029, with James Karam and Undersheriff Russo
D-49.					Audio Recording - Id #802-0033, with James Karam, Greg

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
					Brown and Sheriff Mahar
D-50.					Audio Recording - Id #802-0035, with James Karam and Rich Crist
D-51.					Audio Recording - Id #802-0037, with James Karam
D-52.					Audio Recording - Id #802-0039, with James Karam and Dan Carroll
D-53.					Audio Recording - Id #802-0040, with James Karam and Rich Crist
D-54.					Audio Recording - Id #802-0041, with James Karam and Tom Hendry
D-55.					Audio Recording - Id #802-0043, with James Karam and Linda Baldwin
D-56.					Audio Recording - Id #802-0048, with James Karam and Rich Crist
D-57.					Audio Recording - Id #802-0050, with James Karam
D-58.					Audio Recording - Id #802-0052, with James Karam and Linda Baldwin
D-59.					Audio Recording - Id #802-0057, with Shane Holcomb
D-60.					Audio Recording - Id #802-0062, with James Karam and Ruth Vibert
D-61.					Audio Recording - Id #802-0063, with James Karam and Ruth Vibert
D-62.					Audio Recording -

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
					Id #802-0064, with James Karam and Ruth Vibert
D-63.					Audio Recording - Id #802-0065, with James Karam and Ruth Vibert
D-64.					Audio Recording - Id #802-0066, with James Karam and Ruth Vibert
D-65.					Audio Recording - Id #802-0067, with James Karam and Ruth Vibert
D-66.					Audio Recording - Id #802-0068, with James Karam
D-67.					Audio Recording - Id #802-0069, with James Karam
D-68.					Audio Recording - Id #802-0071, with James Karam

PLEASE TAKE NOTICE that Defendants reserve the right to alter, amend or supplement this Exhibit List as necessary up to the date of trial.

DATED: May 13, 2016
Albany, New York

BAILEY, KELLEHER & JOHNSON, P.C.

By: _____

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Exhibits Returned To Counsel (Date): _____

Signature: _____